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Attorneys for Defendant

DOCKETED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

UNITED FREIGHT AND TRANSPORT,
INC.,

Defendant.

Case No. A05-0122 CV (JWS)

**DEFENDANT'S ANSWERS AND RESPONSES TO EEOC'S FIRST
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT**

United Freight and Transport, Inc. ("United Freight"), by and through its attorneys Dorsey & Whitney LLP, hereby answers and responds to EEOC's First Interrogatories and Requests for Production to Defendant United Freight and Transport, Inc. as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify the person(s) responsible for enforcing, and/or administering defendant's document/record retention policy in effect during the time period January 1, 2003 to date. Please refer to the definition of the term "identify" when answering this interrogatory.

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REQUEST FOR PRODUCTION NO. 22: Provide financial records of defendant from January 1, 2002 to date, including but not limited to all 10K reports, annual reports, other financial disclosures to State and/or Federal regulatory agencies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22: Objection. Documents responsive to this request are not discoverable at this time. Objection. United Freight's financial records are not relevant to any claim or defense asserted in this case and are not likely to lead to the discovery of admissible evidence.

DATED this 25th day of October, 2005, at Anchorage, Alaska.

DORSEY & WHITNEY LLP
Attorneys for Defendant

By: Wendy E. Leukuma
William J. Evans, ABA #9812092
Wendy E. Leukuma, ABA #0211048

CERTIFICATE OF SERVICE

This certifies that on this 25th day of October, 2005, a true and correct copy of the foregoing document was served on the following by first-class mail:

A. Luis Lucero, Jr.
Kathryn Olson
Teri Healy
Equal Employment Opportunity Commission
Seattle District Office
909 1st Avenue, Suite 400
Seattle, Washington 98104

William J. Evans
Certification signature

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